

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA**

QUENTIN M. PARKER and
KATHERINE R. PARKER, husband and
wife and the marital community thereof,

Plaintiffs,

v.

THE STATE OF WASHINGTON;
WASHINGTON STATE PATROL;
CARLOS RODRIGUEZ, in his individual and
official capacities; KRISTI POHL, in her
individual and official capacities; DARRELL
NOYES, in his individual and official
capacities; TRAVIS CALTON, in his
individual and official capacities; MAURICE
RINCON, in his individual and official
capacities; WILLIAM STEEN, in his
individual and official capacities; JAMES
TAYLOR, in his individual and official
capacities; CITY OF OLYMPIA, a
municipality, AARON FICEK, in his
individual and official capacities;
OPERATION UNDERGROUND
RAILOUND, INC., a foreign non-profit
corporation, THURSTON COUNTY, a
municipality and subdivision of the State of
Washington, and SHAWN HORLACHER,
former Thurston County Deputy Prosecutor,
in his individual and official capacities; JOHN
DOE AND JANE DOE 1-10, et.al.

Defendants.

NO. 3:21-cv-5258

NOTICE OF STATE FILED
COURT DOCUMENTS

1 Attached to this Notice, filed herewith, are true and correct copies of the documents filed
2 in the Thurston County Superior Court Cause No. 21-2-00214-34 as of 11:00 a.m. on April 8,
3 2021.

4 I declare under penalty of perjury under the laws of the United States that the foregoing
5 statements are true and correct to the best of my knowledge.

6 //

7 //

8 //

9
10 DATED this 8th day of April 2021.

11
12 ROBERT W. FERGUSON
13 Attorney General

14
15 /s/Lori Nicolavo
16 LORI A. NICOLAVO, WSBA No. 30370
17 STEVE PUZ, WSBA No. 17407
18 OID #91023
19 Assistant Attorneys General
20 Attorneys for Washington State Patrol
21 7141 Cleanwater Drive SW
22 P.O. Box 40126
23 Olympia, WA 40126
24 (360)586-6300
25
26

CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of April, 2021, I caused to be electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following. All parties below were sent a courtesy copy via email.

Attorneys for Plaintiff Harold Karlsvik Harold Karlsvik P.S. P.O. Box 292 South Bend, WA 98586 (360) 942-4612 hkarlsvik@comcast.net	Attorneys for City of Olympia and Aaron Ficek John E. Justice Law, Lyman, Daniel, Kammerrer & Bogdanovich, P.S. 2674 R.W. Johnson Blvd. Tumwater, WA 98512 jjustice@lldkb.com
Attorney for Thurston County Donald R. Peters, Jr. Thurston County Prosecutor's Office 2000 Lakeridge Dr. SW Bldg 2 Olympia, WA 98502-6045 petersr@co.thurston.wa.us	Attorney for Operation Underground Railroad Clifford S. Davidson Snell & Wilmer 2018 156 th Ave NE, Suite 100 Bellevue, Washington 98007 csdavidson@swlaw.com

I certify under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

DATED this 8th day of April, 2021 in Tacoma, Washington.

/s/Lori Nicolavo
LORI NICOLAVO, WSBA No. 30370
STEVE PUZ, WSBA No. 17407
Assistant Attorneys General

E-FILED
 THURSTON COUNTY, WA
 SUPERIOR COURT
 02/16/2021 12:33:01 PM
 Linda Myhre Enlow
 Thurston County Clerk

CIVIL

21-2-00214-34

Thurston COUNTY SUPERIOR COURT
 Case Information Cover Sheet (CICS)

Case Number _____ Case Title Quentin Parker vs Washington State
 Attorney Name Harold Karlsvik Bar Membership Number 23026 Patrol et al
 Alternate Email Address: ~~h.karlsvik@comcast.net~~
 (New Case Number will be Sent to this Email Address)

Please check one category that best describes this case for indexing purposes. Accurate case indexing not only saves time in docketing new cases, but helps in forecasting needed judicial resources. Cause of action definitions are listed on the back of this form. Thank you for your cooperation.

- | | |
|---|--|
| <input type="checkbox"/> ABJ Abstract of Judgment | <input type="checkbox"/> PRG Property Damage – Gangs |
| <input type="checkbox"/> ALR Administrative Law Review | <input type="checkbox"/> PRP Property Damages |
| <input type="checkbox"/> ALRJT Administrative Law Review-Jury Trial (L&I) | <input type="checkbox"/> QTI Quiet Title |
| <input type="checkbox"/> CRP Petition for Certificate of Restoration of Opportunity | <input type="checkbox"/> RDR Relief from Duty to Register |
| <input type="checkbox"/> CHN Non-Confidential Change of Name | <input type="checkbox"/> RFR Restoration of Firearm Rights |
| <input type="checkbox"/> COL Collection | <input type="checkbox"/> SDR School District-Required Action Plan |
| <input type="checkbox"/> CON Condemnation | <input type="checkbox"/> SPC Seizure of Property-Commission of Crime |
| <input type="checkbox"/> COM Commercial | <input type="checkbox"/> SPR Seizure of Property-Resulting from Crime |
| <input type="checkbox"/> DOL Appeal Licensing Revocation | <input type="checkbox"/> STK Stalking Petition |
| <input type="checkbox"/> DVP Domestic Violence | <input type="checkbox"/> SXP Sexual Assault Protection |
| <input type="checkbox"/> EOM Emancipation of Minor | <input type="checkbox"/> TAX Employment Security Tax Warrant |
| <input type="checkbox"/> FJU Foreign Judgment | <input type="checkbox"/> TAX L & I Tax Warrant |
| <input type="checkbox"/> FOR Foreclosure | <input type="checkbox"/> TAX Licensing Tax Warrant |
| <input type="checkbox"/> FPO Foreign Protection Order | <input type="checkbox"/> TAX Revenue Tax Warrant |
| <input type="checkbox"/> HAR Unlawful Harassment | <input type="checkbox"/> TMV Tort – Motor Vehicle |
| <input type="checkbox"/> INJ Injunction | <input type="checkbox"/> TRJ Transcript of Judgment |
| <input type="checkbox"/> INT Interpleader | <input checked="" type="checkbox"/> TTO Tort – Other |
| <input type="checkbox"/> LCA Lower Court Appeal – Civil | <input type="checkbox"/> TXF Tax Foreclosure |
| <input type="checkbox"/> LCI Lower Court Appeal – Infractions | <input type="checkbox"/> UND Unlawful Detainer – Commercial |
| <input type="checkbox"/> LUPA Land Use Petition Act | <input type="checkbox"/> UND Unlawful Detainer – Residential |
| <input type="checkbox"/> MAL Other Malpractice | <input type="checkbox"/> VAP Vulnerable Adult Protection Order |
| <input type="checkbox"/> MED Medical Malpractice | <input type="checkbox"/> VVT Victims of Motor Vehicle Theft-Civil Action |
| <input type="checkbox"/> MHA Malicious Harassment | <input type="checkbox"/> WDE Wrongful Death |
| <input type="checkbox"/> MSC2 Miscellaneous – Civil | <input type="checkbox"/> WHC Writ of Habeas Corpus |
| <input type="checkbox"/> MST2 Minor Settlement – Civil (No Guardianship) | <input type="checkbox"/> WMW Miscellaneous Writs |
| <input type="checkbox"/> PCC Petition for Civil Commitment (Sexual Predator) | <input type="checkbox"/> WRM Writ of Mandamus |
| <input type="checkbox"/> PFA Property Fairness Act | <input type="checkbox"/> WRR Writ of Restitution |
| <input type="checkbox"/> PIN Personal Injury | <input type="checkbox"/> WRV Writ of Review |
| <input type="checkbox"/> PRA Public Records Act | <input type="checkbox"/> XRP Extreme Risk Protection Order |

IF YOU CANNOT DETERMINE THE APPROPRIATE CATEGORY, PLEASE DESCRIBE THE CAUSE OF ACTION BELOW.

Malicious Prosecution, False Arrest, Unlawful Imprisonment
 Please Note: Public information in court files and pleadings may be posted on a public Web site.
Overage, Detention, Slander, 1983 Civil Rights violation

E-FILED
THURSTON COUNTY, WA
SUPERIOR COURT
02/16/2021 12:32:54 PM
Linda Myhre Enlow
Thurston County Clerk

☐ EXPEDITE

☐ Hearing is set:

Date: _____

Time: _____

Judge/Calendar: _____

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THURSTON COUNTY

QUENTIN M. PARKER and KATHERINE R.
PARKER, husband and wife and the marital
community thereof,

Plaintiffs,

vs.

Case No: 21-2-00214-34

SUMMONS

THE STATE OF WASHINGTON;
WASHINGTON STATE PATROL; CARLOS
RODRIGUEZ, in his individual and official
capacities; KRISTI POHL, in her individual and
official capacities; DARRELL NOYES, in his
individual and official capacities; TRAVIS
CALTON, in his individual and official
capacities; MAURICE RINCON, in his individual
and official capacities; WILLIAM STEEN, in his
individual and official capacities; JAMES
TAYLOR, in his individual and official
capacities; CITY OF OLYMPIA, a municipality,
AARON FICEK, in his individual and official
capacities; OPERATION UNDERGROUND
RAILROUND, INC., a foreign non-profit
corporation, THURSTON COUNTY, a
municipality and subdivision of the State of
Washington, and SHAWN HORLACHER, former
Thurston County Deputy Prosecutor, in his
individual and official capacities; JOHN DOE
AND JANE DOE 1-10, et.al.

Defendants.

SUMMONS -1

Harold Karlsvik, P.S.
Attorney at Law
P.O. Box 292
Olympia, WA 98586
1 (360) 942-4612

1 A lawsuit has been started against you in the above-entitled court by plaintiffs
2 QUENTIN M. PARKER and KATHERINE R. PARKER. Plaintiffs' claims are stated in the
3 written complaint, a copy of which is served upon you with this summons.

4 In order to defend against this lawsuit, you must respond to the complaint by stating
5 your defense, in writing, and serve a copy upon the undersigned attorney for the plaintiff **within**
6 **twenty (20) days** after the service of this summons, excluding the day of service, if served
7 within the State of Washington **(or within 60 days after service of this summons, if served**
8 **outside the State of Washington)**, or a default judgment may be entered against you without
9 notice. A default judgment is one where plaintiff is entitled to what she asks for because you
10 have not responded. If you serve a notice of appearance on the undersigned attorney, you are
11 entitled to notice before a default judgment may be entered.

12 You may demand that the plaintiff file this lawsuit with the court. If you do so, the
13 demand must be in writing and must be served upon the plaintiff **within fourteen (14) days**
14 after you serve the demand, the plaintiff must file this lawsuit with the court, or the service on
15 you of this summons and complaint will be void.

16 If you wish to seek the advice of an attorney in this matter, you should do so promptly
17 so that your written response, if any, may be served on time.

18 This summons is issued pursuant to Rule 4 of the Superior Court Civil Rules of the State
19 of Washington.

20 **DATED** this 15th day of February, 2021.

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HAROLD KARLSVIK, WSBA # 23026
Attorney for Plaintiff

SUMMONS -2

Harold Karlsvik, P.S.
Attorney at Law
P.O. Box 292
Olympia, WA 98586
1 (360) 942-4612

E-FILED
THURSTON COUNTY, WA
SUPERIOR COURT
02/16/2021 12:33:53 PM
Linda Myhre Enlow
Thurston County Clerk

☐ EXPEDITE
☐ Hearing is set:
Date: _____
Time: _____
Judge/Calendar: _____

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THURSTON COUNTY

QUENTIN M. PARKER and KATHERINE R.
PARKER, husband and wife and the marital
community thereof,

Plaintiffs,

vs.

Case No: 21-2-00214-34

COMPLAINT FOR DAMAGES

THE STATE OF WASHINGTON;
WASHINGTON STATE PATROL; CARLOS
RODRIGUEZ, in his individual and official
capacities; KRISTI POHL, in her individual and
official capacities; DARRELL NOYES, in his
individual and official capacities; TRAVIS
CALTON, in his individual and official
capacities; MAURICE RINCON, in his individual
and official capacities; WILLIAM STEEN, in his
individual and official capacities; JAMES
TAYLOR, in his individual and official
capacities; CITY OF OLYMPIA, a municipality,
AARON FICEK, in his individual and official
capacities; OPERATION UNDERGROUND
RAILROUND, INC., a foreign non-profit
corporation, THURSTON COUNTY, a
municipality and subdivision of the State of
Washington, and SHAWN HORLACHER, former
Thurston County Deputy Prosecutor, in his
individual and official capacities; JOHN DOE
AND JANE DOE 1-10, et.al.

Defendants.

Complaint for Damages 1

Harold Karlsvik, P.S.
P.O. Box 292
South Bend, WA 98586
1 (360) 942-4612

1 COMES NOW the plaintiff, QUENTIN M. PARKER AND KATHERINE R. PARKER,
2 husband and wife and the marital community composed thereof, by and through their attorney,
3 HAROLD KARLSVIK, Attorney at Law, and for federal and state claims against the defendants,
4 allege and complain as follows:
5

6 I. INTRODUCTION

7 1.1 Quentin M. Parker is a 32-year-old man who enlisted in the United States Army
8 on/or about July 1, 2015. Mr. Parker's intent was to establish a lifelong career serving and
9 protecting his country. At the time of these alleged cause of actions, Mr. Parker was an active-
10 duty soldier stationed at the Joint Base Lewis McChord in the State of Washington. Katherine
11 Parker, his wife is his sole dependent.
12

13 1.2 The State of Washington allowed Washington State Patrol Detective(s) Carlos
14 Rodriguez, Kristi Pohl, Darrell Noyes, Travis Calton, Maurice Rincon, William Steen, James,
15 Taylor and other enforcement personnel to conduct rogue "Net Nanny" sting operations
16 throughout the state under the Missing and Exploited Children's Task Force, hereafter (MECTF).
17

18 1.3 The Washington State Patrol task force (MECTF) partnered with Operation
19 Underground Railroad, Inc., a private non-profit group anchored out of the State of Utah,
20 conducting business throughout 25 states including Washington and the state of California.
21

22 1.4 Detective Sergeant Carlos Rodriguez, on the behalf of the Washington State
23 Patrol and his (MECTF) team partnered with the Operation Underground Railroad, and other law
24 enforcement agencies to run an unfettered operation of entrapping, arresting and maliciously
25 prosecuting men, specifically Mr. Parker, throughout the state of Washington.
26

1 1.5 Once these men were arrested, the Washington State Patrol, Detective Sergeant
2 Rodriguez and the Operation Underground Railroad went on a public campaign to discredit and
3 slander the accused by calling them "Dangerous Sexual Predators who targeted Children" prior
4 to any convictions of the alleged crimes that were created in the minds of law enforcement.

5 1.6 The Washington State Patrol and the Operation Underground Railroad continued
6 to post and/or leave slanderous statements posted about defendants even after several defendants
7 were acquitted or cases were dismissed by county prosecutors.

8 1.7 Due to the actions of the defendants, Mr. Parker was arrested, charged, and
9 maliciously prosecuted in Thurston County, Washington for seeking and responding to a social
10 media ad offering the **legal activity of (DDLG)** a form of KINK, an acceptable alternative
11 lifestyle among consenting adults.

12 1.8 All defendants knew or should have known that by allowing the Net Nanny Sting
13 Operation to cast such a wide unchecked, unfettered "net" that innocent citizens of the State of
14 Washington could and would be entrapped in their haste to boost the taskforce arrest numbers.

15 1.9 These bolstered arrest numbers were utilized for the benefit of the Washington
16 State Patrol and their taskforce partners the Operation Underground Railroad, Inc., claiming to
17 have saved children, in efforts to increase donor support and increase donor contributions.

18 1.10 Innocent citizens of the State of Washington have been misled by the effort of
19 defendants to utilize the sound bite of "raping children" as a method to eliminate any fairness to
20 the victims that were maliciously prosecuted, and their lives destroyed by the actions of all
21 defendants.

22
23
24 //

1 1.11 Mr. Parker was incarcerated in the Thurston County Jail, had his name posted in
2 news releases, Washington State Patrol press release, Operation Underground Railroads' press
3 release and online social media postings. His life and future are forever tainted and destroyed by
4 the actions of all defendants.

5 II. JURISDICTION

6 Plaintiffs realleges 1.1 through 1.11 and incorporates them herein by this reference.

7 2.1 The court has jurisdiction pursuant to RCW 2.08.010 because the plaintiff's demand
8 exceeds \$300.00.
9

10 2.2 The acts and omission given rise to the cause of action occurred in Thurston County,
11 Washington.

12 2.3 Plaintiffs have filed the required tort claim for damages with defendant State of
13 Washington, defendant Thurston County, and defendant City of Olympia.

14 2.4 Sixty, (60) days have elapsed since the plaintiff's filing of the above indicated claim
15 notices in 2.3.

16 2.5 The jurisdiction of this Court over claims arising under 42 USC §1983 is based on
17 Sintra, Inc. v. City of Seattle, 119 Wn.2d 1, 11, 829 P.2d 765 (2009) (Washington Courts have
18 concurrent jurisdiction with federal courts to hear 42 USC §1983 claims).
19

20 III. PARTIES

21 Plaintiffs realleges 1.1 through 2.5 and incorporates them herein by this reference.

22 3.1 Plaintiffs, Quentin M. Parker, and Katherine R. Parker are husband and wife, and
23 reside within Pierce County, Washington.

24 //

1 3.2 Defendant State of Washington is responsible for enforcing and defending the laws of
2 the State of Washington including the Washington Constitution.

3 3.3 Defendant Carlos Rodriquez was at all times material to this Complaint an employee
4 of the Washington State Patrol and resided in the State of Washington.

5 3.4 Defendant Kristi Pohl was at all times material to this Complaint an employee of the
6 Washington State Patrol and resided in the State of Washington.

7 3.5 Defendant Darrell Noyes was at all times material to this Complaint an employee of
8 the Washington State Patrol and resided in the State of Washington.

9 3.6 Defendant Travis Calton was at all times material to this Complaint an employee of
10 the Washington State Patrol and resided in the State of Washington.

11 3.7 Defendant Maurice Rincon was at all times material to this Complaint an employee of
12 the Washington State Patrol and resided in the State of Washington.

13 3.8 Defendant William Steen was at all times material to this Complaint an employee of
14 the Washington State Patrol and resided in the State of Washington.

15 3.9 Defendant James Taylor was at all times material to this Complaint an employee of
16 the Washington State Patrol and resided in the State of Washington.

17 3.10 Defendant Operation Underground Railroad, Inc. dba: Operation Underground
18 Railroad at all times material to this Complaint partnered with the Washington State Patrol while
19 conducting business as a Foreign Non-Profit in the State of Washington even after the required
20 registration with the Washington Secretary of State had terminated. UBI No. 603-587-353 was
21 inactive as of April 13, 2017.

22 //
23

1 3.11 Defendant Operation Underground Railroad, Inc. dba: Operation Underground
2 Railroad all times material to this Complaint registered with the California Secretary of State
3 under Entity No. C3790974 as a Foreign Non-Profit listing its headquarters and principal office
4 in the state of California.

5 3.12 Defendant Operation Underground Railroad, Inc. dba: "Underground Railroad
6 Project, The" at all times material to this Complaint registered with the Utah Secretary of State
7 under Entity No. 8791496-0140 as a Domestic Non-Profit.

8
9 3.13 At all times material to this Complaint, Defendant Operation Underground Railroad,
10 et.al, its employees and/or agents were acting within the scope of their employment and for the
11 benefit of the non-profit Operation Underground Railroad, Inc., Underground Railroad, and
12 Underground Railroad Project, The.

13 3.14 Defendant Thurston County is a municipal corporation and subdivision of the State of
14 Washington located. At all times material to this Complaint, defendant Shawn Horlacher was an
15 employee and/or agent of Thurston County acting within the scope of his employment as a
16 Thurston County Deputy Prosecutor.

17
18 3.15 Defendant City of Olympia is a municipal corporation located in the Thurston
19 County, Washington State. At all times material to this Complaint, defendant Officer Aaron
20 Ficek was an employee and/or agent of defendant City of Olympia, acting within the scope of his
21 employment as a City of Olympia police officer.

22 3.16 Plaintiff alleges that at all times material to this Complaint, defendant State of
23 Washington, defendant Thurston County, defendant Operation Underground, etal, and defendant
24 City of Olympia, are vicariously liable for each of their employees.

1 3.17 All acts alleged and complained of occurred in THURSTON COUNTY, within the
2 Western District of Washington.

3 IV. FACTS

4 Plaintiffs realleges 1.1 through 3.17 and incorporates them herein by this reference.

5 4.1 Washington State Patrol Detective Sergeant (Sgt.) Carlos Rodriquez was the
6 supervising detective of the Missing and Exploited Children's Task Force (MECTF).

7 4.2 The MECTF task force was created to provide back-up assistance to law enforcement
8 agencies investigating sexual exploitation crimes against children.

9 4.3 Under the MECTF unit Detective Sergeant (Sgt.) Carlos Rodriquez created the Net
10 Nanny Sting Operation with its first sting conducted in 2015 termed Net Nanny 1.

11 4.4 The Net Nanny sting operation utilized Washington State Patrol Detectives, Troopers
12 and enlisted other law enforcement personnel from federal and local jurisdictions.

13 4.5 The undercover scheme was to create ads in adult social media websites by creating
14 profiles of adult women to include their age and photographs to meet the terms and conditions of
15 the social medial website.

16 4.6 The MECTF team would utilize creative trained techniques to evade the rules and
17 walk a tight line between a ruse and all-out entrapment by luring unsuspecting men off the social
18 media platform to private text messaging with an undercover officer.

19 4.7 This luring allowed the MECTF team to talk dirty and use suggestive language in
20 effort to entrap men into saying and doing things that they might not otherwise say or do.

21 4.8 The primary focus was to increase arrest numbers under the selling "sound-bite" that
22 the MECTF proactive sting operations were "*saving children from being raped*", but the reality

1 was that the Washington State Patrol and their partnership with the Operation Underground
2 Railroad, Inc. et.al was increasing over-time income for law enforcement and playing on the tear
3 strings of Operation Underground Railroad, Inc's donors.

4 4.9 After each Net Nanny Sting Operation, the Washington State Patrol and Operation
5 Underground Railroad Inc., et.al would grab the airways and broadcast to the public and donors
6 about what a good job they had done arresting these men and saving these "fictitious children" to
7 increase donations and fund more overtime for all involved law enforcement personnel.

8 4.10 In February 2019, Detective Sgt. Carlos Rodriquez, MECTF, and City of Olympia
9 Officer Aaron Ficek conducted Operation Net Nanny 15 utilizing the SKOUT social media
10 platform.

11 4.11 Detective Sgt. Rodriquez created a fictitious profile account under the username
12 "Rowdy Rhonda720". The profile advertisement indicated that she was interested in "men and
13 women."

14 4.12 The ad stated the following:

15 "New in town. Single mom. I have three girls to share.
16 Looking for like-minded people that are into
17 ddlg/incest/young taboo. No curious wanted, Only
18 serious. Young fun. Taboo".

19 4.13 According to the Urban Dictionary, "dd/lg" is defined as "Daddy Dom / Little Girl.
20 DDLG, or dd/lg, is a relationship in which one person is the caregiver or "daddy" and the other is
21 childlike. **It is NOT a relationship between an actual father and daughter or any minor**
22 **child.**

23 //

1 4.14 DDLG is a sub-form of BDSM and KINK relationships that may or may not involve
2 sex, but often involves play with child-like things, such as stuffed animals, bed-time stories, and
3 spankings. The "lg" part of the relationship is often called the "little". A simple and quick
4 internet search demonstrates that this is the preeminent definition of DDLG.

5 4.15 It is widely known in the DDLG, BDSM and KINK community that DDLG does not
6 mean "daddy daughter little girl" and has absolutely nothing to do with sexual exploitation of
7 children. DDLG stands for "daddy Dom little girl", which is a known role-playing experience
8 among consenting adults.
9

10 4.16 Detective Sgt. Carlos Rodriguez was aware of this definition and alternative lifestyle
11 prior to placing the "Rowdy Rhonda720" ad. He was aware that DDLG was a term used for
12 lawful activity of DDLG within the KINK community in the State of Washington.

13 4.17 Detective Sgt. Carlos Rodriguez and Detective Kristi Pohl in an under compacity
14 communicated with Mr. Parker in the SKOUT platform and private text messages utilizing terms
15 and scenarios consistent with DDLG role play. Both Detectives had utilized similarly language
16 in previous Net Nanny Sting Operations and knew that a person responding to the undercover ad
17 may have a different understanding then the crime created in the mind of law enforcement.
18

19 4.18 During the State vs. Quentin Parker defense interview of Detective Sgt. Rodriguez
20 stated and confirmed that he knew DDLG was legal in the state of Washington and did
21 absolutely no follow-up to protect Mr. Parker from being wrongfully arrested and maliciously
22 prosecuted.

23 4.19 On February 17, 2019, Defendant Quentin M. Parker responded to the SKOUT social
24 media profile seeking to learn more about DDLG role playing between consenting adults. Mr.
25

1 Parker responded to the ad created and posted by Detective Sgt. Carlos Rodriguez. Mr. Parker's
2 SKOUT profile page states that he is interested in "women" and he was looking for "friends,
3 flirting, fun and chat." Mr. Parker continued to text with Detective Kristi Pohl.

4 4.20 Detective Sgt. Rodriguez admitted that he had erased all but the last SKOUT
5 messages between himself and Mr. Parker during an active criminal investigation. He did not
6 include this information in his written report in State vs. Quentin Parker.

7 4.21 Detective Sgt. Rodriguez claimed to have no recollection of the substance of the
8 missing conversations. He further stated that he had told Detective Pohl that he had deleted the
9 messages, but when Detective Pohl was interviewed, she made no such assertion.

10 4.22 Detective Sgt. Rodriguez stated that Mr. Parker's criminal case was not the only Net
11 Nanny Sting Operation case where he had deleted text message communications.

12 4.23 Mr. Parker agreed to meet with RowdyRhonda 720, who he believed to be engaging
13 in DDLG with an adult female and other adult female in a role playing and safe environment.

14 4.24 Instead, when Mr. Parker reached the location of the residence, he was invited into
15 the house only to be greeted with excessive force by Washington State Patrol Trooper Travis
16 Calton, Trooper Maurice Rincon, Trooper William Steen, and Trooper James Taylor of the arrest
17 team. The arrest team was heavily armed and dressed as a SWAT or armed forces team with
18 multiple guns and lights pointed directly at Mr. Parker.

19 4.25 Mr. Parker was arrested and taken to a Washington State Patrol office and
20 interrogated for almost (3) hours by Washington State Patrol Detective Darrell Noyes, and City
21 of Olympia Officer Aaron Ficek.

1 4.26 During the audio and video recorded interrogation, Mr. Parker repeatedly told both
2 Detective Noyes and Officer Ficek that he was responding to an advertisement profile for DDLG
3 and that it pertained to all consenting adult role playing a form of age regression and no actual
4 children were involved.

5 4.27 Mr. Parker even was able to get both Detective Noyes and Officer Ficek to look up
6 the term DDLG and they confirmed that the "urban dictionary" was consistent with what Mr.
7 Parker had been telling them throughout out the entire interrogation.

8 4.28 Detective Noyes and Officer Ficek knew that they did not have probable cause to
9 arrest Mr. Parker, and they did absolutely nothing to protect Mr. Parker from being falsely
10 arrested and maliciously prosecuted. They knew he was innocent but did nothing to make sure
11 that Mr. Parker was not wrongfully caught within the wide Net Nanny Net cast by the
12 Washington State Patrol, Detective Sgt. Carlos Rodriguez, and MECTF.

13 4.29 Mr. Parker was arrested and charged in Thurston County Superior court with
14 Attempted Rape of a Child in the First Degree (2 counts) and one count of attempted Rape of a
15 Child in the Second Degree.

16 4.30 The Washington State Patrol investigative reports presented to the Thurston County
17 Prosecutor's office were untruthful, excluded exculpatory evidence and violated Washington
18 State Patrol written policy.

19 4.31 Former Thurston County Deputy Prosecutor Shawn Horlacher declared under penalty
20 of perjury in the probable cause statement that he personally had read all of the police reports
21 regarding the alleged charges against Mr. Parker.

1 4.32 Deputy Prosecutor Shawn Horlacher had a duty and obligation to make an
2 independent judgment based upon the case facts.

3 4.33 Deputy Prosecutor Shawn Horlacher either was untruthful and did not read the police
4 reports prior to charging Mr. Parker, or he intentional or negligently failed to investigate into the
5 fact that the Washington State Patrol **advertised DDLG which is legal in Washington State**
6 and Mr. Parker responded and showed up for DDLG among consenting adults and therefore no
7 probable cause existed to charge Mr. Parker with any crime.

8 4.34 Once Mr. Parker was arrested, the Washington State Patrol, Detective Sergeant
9 Rodriguez and the Operation Underground Railroad went on a public campaign to discredit and
10 slander his name by calling Mr. Parker a “Dangerous Sexual Predators who targeted Children”
11 prior to Mr. Parker being adjudicated through the courts with a conviction.

12 4.35 The Washington State Patrol and the Operation Underground Railroad continue to as
13 of the date of the filing of this Complaint have slanderous statements posted about Mr. Parker
14 being a Dangerous Sexual Predator who targeted Children even though all charges against him
15 were later dismissed by the Thurston County Prosecuting Attorney’s Office.
16

17 V. **FIRST CLAIM FOR RELIEF**

18 **(42 U.S.C. § 1983--Illegal Seizure and Arrest and Monell claims)**

19 Plaintiffs realleges 1.1 through 4.35 and incorporates them herein by this reference.

20 5.1. Plaintiff Quentin Parker has been deprived of his right to be free from illegal searches
21 and seizures, in violation of the Fourth Amendment of the United States Constitution, under
22 color of state law, in violation of 42 U.S.C. § 1983. The Defendants Carlos Rodriguez, Kristi
23 Pohl, Darrell Noyes, Travis Calton, Maurice Ricon, William Steen, James Taylor, and Aaron
24

1 Ficek actions toward Mr. Quentin Parker violated Mr. Parker's constitutional rights guaranteed
2 against state incursion by the Fourth and Fourteenth Amendments of the United States
3 Constitution due to the unreasonable seizure of his person.

4 5.2 The misconduct described in this Count was objectively unreasonable and undertaken
5 with willfulness and reckless indifference to the rights of others for which an award of punitive
6 damages is warranted.

7 5.3 At all times herein mentioned, the City of Olympia had a mandatory duty of care to
8 hire properly and adequately, train, retain, supervise, and discipline officer Aaron Ficek so as to
9 avoid unreasonable risk of harm to its citizens. With deliberate indifference, the City of Olympia
10 failed to take necessary, proper, or adequate measures in order to prevent the violation of
11 Plaintiff's rights. Officer Ficek, whose conduct is described above did not know what constitutes
12 probable cause to arrest a citizen because of inadequate training.

13 5.4 By virtue of the facts set forth above, and as a result of its policies, practices, customs,
14 and usages, the city of Olympia caused Mr. Parker to be deprived of rights guaranteed by the
15 Fourth and Fourteenth Amendments to the United States Constitution, specifically the rights to
16 be free from unreasonable seizures of his person and excessive force.

17 VI. SECOND CLAIM FOR RELIEF

18 (42 United States Code §1983 -- Unnecessary Force)

19 Plaintiffs realleges 1.1 through 5.4 and incorporates them herein by this reference.

20 6.1 The actions of defendants Washington State Patrol Troopers Travis Calton, Maurice
21 Rincon, William Steen and James Taylor and each of them in pointing their guns at Plaintiff
22 Quentin Parker and in threatening to shoot Mr. Parker deprived him of his constitutional right to
23

1 be free from summary punishment and excessive force and deprived him of his Fourth
2 Amendment rights, under color of state law and in violation of 42 USC §1983.

3 6.2 Defendants and each of them subjected Plaintiff Quentin Parker to such deprivations
4 by malice and/or a reckless and conscious disregard of plaintiffs' statutory and constitutional
5 rights for which an award of punitive damages is warranted.

6 6.3 The direct and proximate result of each defendants' acts is that plaintiff has been
7 forced to endure physical pain and suffering, mental suffering, and emotional distress, and has
8 had to incur medical and legal expenses. The conduct of each individually named and/or
9 unidentified officer was done in reckless and conscious disregard of the pain and suffering it was
10 bound to inflict upon Plaintiffs for which an award of punitive damages is mandated against each
11 individual officer.
12

13 **VII. THIRD CLAIM FOR RELIEF**

14 **(42 United States Code §1983 -- Failure to Prevent Civil Rights Violation)**

15 Plaintiffs realleges 1.1 through 6.3 and incorporates them herein by this reference.

16 7.1 The actions of defendant Washington State Patrol Troopers Travis Calton, Maurice
17 Rincon, William Steen and James Taylor and each of them in watching their fellow officers use
18 unreasonable force against Plaintiff and having the opportunity to intervene to prevent the
19 violation of plaintiff's constitutional rights, and failing to attempt to stop it, deprived Plaintiff of
20 his constitutional right to be free from the use of excessive force and freedom from summary
21 punishment, under color of state law and in violation of 42 USC §1983.
22

23 7.2 Defendants and each of them, subjected Plaintiff to such deprivation by malice and/or
24 a reckless and conscious disregard of his rights.
25

1 7.3 The direct and proximate result of each defendant's acts is that Plaintiff has been
2 forced to endure physical pain and suffering, mental suffering and emotional distress, and was
3 deprived of his physical liberty and has had to incur medical and legal expenses. The conduct of
4 defendant officers, and each of them, was done in reckless and conscious disregard of the pain
5 and suffering their fellow officers were inflicting upon plaintiff, for which an award of punitive
6 damages is mandated against each individually named officer.

7
8 **VIII. FOURTH CLAIM FOR RELIEF**
9 **(42 United States Code §1983 -- Judicial Deception)**

10 Plaintiffs realleges 1.1 through 7.3 and incorporates them herein by this reference.

11 8.1 Defendants Detective Sgt. Carlos Rodriguez, Detective Kristi Pohl, Trooper Travis
12 Calton, Maurice Rincon, William Steen and James Taylor made deliberate falsehoods and acted
13 with disregard for the truth in submitting official sworn reports to the Thurston County
14 Prosecuting Attorney.

15 8.2 Detective Sgt. Carlos Rodriguez, Detective Kristi Pohl, Trooper Travis Calton, Maurice
16 Rincon, William Steen and James Taylor acts establish that, but for the dishonesty and omissions
17 in their reports, the criminal charges against Plaintiff Quentin Parker would not have occurred.

18 8.3 Detective Sgt. Carlos Rodriguez, Detective Kristi Pohl, Trooper Travis Calton,
19 Maurice Rincon, William Steen and James Taylor acts violated Quentin Parker's rights protected
20 by United States Constitution, acting under color of state law and in violation of 42 USC §1983.

21 8.4 As a direct and proximate result of the acts of defendants as complained of herein,
22 Plaintiff suffered great and grievous emotional anguish and loss of freedom and liberty and
23 continues to suffer emotional anguish. Plaintiffs incurred legal expenses in defending against the
24 prosecution and in obtaining his freedom in amount to be proven at trial.

IX. FIFTH CLAIM FOR RELIEF

(State Law Claim -- Malicious Prosecution)

Plaintiffs realleges 1.1 through 8.4 and incorporates them herein by this reference.

9.1 Said prosecution of the Plaintiff Quentin Parker was instituted by defendants without probable cause for the institution or continuation of the proceedings. The facts observed by defendants prior to arresting Plaintiff and the matters known to defendants before the instituting of the aforementioned prosecution would not have warranted a reasonable person to believe that any criminal offense had been committed by Plaintiff.

9.2 The proceedings were instituted and continued through malice and were abandoned by the State.

9.3 Detective Sgt. Carlos Rodriguez, Detective Kristi Pohl, Trooper Travis Calton, Maurice Rincon, William Steen and James Taylor acted with malice in drafting and false joint certifying official police reports which they knew to be false, incomplete and containing misleading information. All defendants acted with implied malice by arresting Plaintiff without probable cause.

9.4 By reason of the above, Plaintiffs have been brought into public scandal, disrepute and disgrace, and their ability to function properly has been greatly hindered, causing them to suffer emotional trauma and harm.

9.5 As a direct and proximate result of the acts of defendants as complained of herein, Plaintiff suffered great and grievous emotional anguish and loss of freedom and liberty and continues to suffer emotional anguish. Plaintiffs incurred legal expenses in defending against the prosecution and in obtaining his freedom in amount to be proven at trial.

X. SIXTH CLAIM FOR RELIEF

(State Law Claim -- Intentional Infliction of Emotional Distress (Outrage))

Plaintiffs realleges 1.1 through 9.5 and incorporates them herein by this reference.

10.1. The defendants' conduct was intentional, extreme, and outrageous, and caused Plaintiffs severe emotional distress.

10.2 Defendants' actions and material omissions intentionally and recklessly inflicted distress on Plaintiffs, and caused severe emotional distress.

10.3 Defendants' conduct was extreme and outrageous, and the distress inflicted upon plaintiffs was so severe that no reasonable person could be expected to endure it.

10.4 Defendants' behavior was so outrageous in character, and so extreme in degree, as to go beyond all possible bounds of decency, and is atrocious and utterly intolerable in a civilized society.

10.5 As a direct and proximate result of the acts of defendants as complained of herein, Plaintiff suffered great and grievous emotional anguish and loss of freedom and liberty and continues to suffer emotional anguish. Plaintiffs incurred legal expenses in defending against the prosecution and in obtaining his freedom in amount to be proven at trial.

XI. SEVENTH CLAIM FOR RELIEF

(State Law Claim -- Negligent Infliction of Emotional Distress)

Plaintiffs realleges 1.1 through 10.5 and incorporates them herein by this reference.

11.1. Defendants negligently inflicted emotional distress upon Plaintiffs by breaching duties owed to Plaintiffs, and such breaches proximately causing Plaintiffs harm and injury in the form of emotional distress.

1 11.2. The emotional distress proximately caused by Defendants and suffered by Plaintiffs is
2 within the scope of foreseeable harm of Defendants' negligent conduct.

3 11.3. The distress suffered by Plaintiffs is a reasonable reaction given the circumstances
4 presented herein.

5 11.4 Plaintiffs has manifested objective symptomology of the emotional distress suffered as
6 a proximate result of the conduct, actions, and material omissions by Defendants.

7 11.5 As a direct and proximate result of the acts of defendants as complained of herein,
8 Plaintiff suffered great and grievous emotional anguish and loss of freedom and liberty and
9 continues to suffer emotional anguish. Plaintiffs incurred legal expenses in defending against the
10 prosecution and in obtaining his freedom in amount to be proven at trial.

12 **XII. EIGHT CLAIM FOR RELIEF**

13 **(State Law Claim -- False Arrest)**

14 Plaintiffs realleges 1.1 through 11.5 and incorporates them herein by this reference.

15 12.1 Defendants caused Mr. Parker to be unlawfully restrained and imprisoned.

16 12.2. Defendants unlawfully violated Mr. Parker's right of personal liberty.

17 12.3 Mr. Parker was restrained, imprisoned, and deprived of his liberty and freedom to
18 remain in the place of his lawful choice.

19 12.4 Defendants participated in the unlawful arrest. Defendants procured and instigated the
20 unlawful arrest and detention of Mr. Parker and did so by taking an active part in bringing about
21 the unlawful arrest and detention of Mr. Parker by affirmative direction, persuasion, request, and
22 voluntary participation.

23 12.5 The actions and material omissions by Defendants, and each of them, directly and
24 proximately caused injury and damages to Mr. Parker in an amount to be proved at trial.

XIII. NINTH CLAIM FOR RELIEF

(State Law Claim -- Negligence)

Plaintiffs realleges 1.1 through 12.5 and incorporates them herein by this reference.

13.1 Defendants had a duty to ensure that Mr. Parker's constitutional rights were not violated and that he was not injured by their investigation and prosecution efforts, and any reports or other discovery was valid, did not contain false information, and did not omit material information, to include potential exculpatory evidence.

13.2 Defendants had a duty to ensure that the police reports being executed were valid, did not contain false information, and did not omit material information.

13.3 Defendant's breached their duties owed to plaintiffs.

13.4 The actions and material omissions by Defendants, and each of them, directly and proximately caused injury and damages to plaintiffs in an amount to be proved at trial.

XIV. TENTH CLAIM FOR RELIEF

(State Law Claim -- Defamation)

Plaintiffs realleges 1.1 through 13.4 and incorporates them herein by this reference.

14.1 Defendants Washington State Patrol, Detective Sgt. Rodriguez, and Defendant Operation Underground Railroad, et.al., posted press releases on their individual web pages. The press releases listed Plaintiff Quentin Parker by name and referred to him as a "Dangerous Sexual Predators who targeted Children".

14.2. The press release at issue contained false statements, was an unprivileged communication, was the fault of Defendant's Washington State Patrol, Rodriguez and Operation Underground Railroad, et.al., and was the proximate cause of plaintiffs' damages.

1 14.3 The slanderous press releases by Defendants Washington State Patrol and Operation
2 Underground Railroad was seen by staff at the Madigan Army Medical Center causing Dr. Ryan
3 Heitman, DO to suspend the fertility treatments that plaintiffs were undergoing.

4 14.4 The slanderous press release and public posting by Defendants Washington State
5 Patrol and Operation Underground Railroad was seen by Jessica Benedetto who in returned on
6 February 21, 2019 at 8:41 pm sent a hateful and harassing Facebook message to plaintiff
7 Katherine Parker.

8
9 14.5 As a proximate cause of defendants' actions Plaintiffs' reputation has been destroyed
10 by the press releases and has caused emotional distress in an amount to prove at trial.

11 **XV. ELEVENTH CLAIM FOR RELIEF**

12 **(State Law Claim -- Abuse of Process)**

13 Plaintiffs realleges 1.1 through 14.5 and incorporates them herein by this reference.

14 15.1 Defendants, and each of them, misused and misapplied a legal process for an end
15 which the process was not designed to accomplish.

16 15.2 Defendants' misuse and misapplication of legal processes was done maliciously and
17 for a collateral objective, and with an ulterior purpose to cause the unlawful and unreasonable
18 arrest, imprisonment and prosecution of Mr. Parker, and to violate his constitutional rights.

19 15.3 Defendants had an ulterior purpose to accomplish an object not within the proper
20 scope of legal process and committed acts and material omissions in the use of legal process not
21 proper in the regular prosecution of the proceedings.

22 15.4 Defendants misused the judicial system's process to achieve an inappropriate end
23 causing harm and injury to Mr. Parker, and violate his federal rights, to include unreasonable and
24 unlawful arrest and imprisonment, harassment and coercion.

1 15.5 The actions and material omissions by Defendants, and each of them, directly and
2 proximately caused injury and damages to Mr. Parker in an amount to be proved at the time of
3 trial.

4 **XVII. PRAYER FOR RELIEF**

5 **WHEREFORE**, plaintiff prays that the Court:

- 6 1. Compensatory damages;
- 7 2. Punitive damages from the individual defendants on Plaintiffs' claims under 42 U.S.C.
- 8 section 1983;
- 9 3. Costs, including reasonable attorneys' fees under 42 U.S.C. section 988 and to the extent
- 10 otherwise permitted by law;
- 11 4. Such other relief as may be just and equitable.
- 12 5. Award actual, special, compensatory, and general damages to plaintiffs;
- 13 6. Order punitive damages against the individual defendants, all of whom are being sued in
- 14 their individual capacities as well as their official capacities;
- 15 7. Award attorney's fees and costs to the prevailing plaintiff; and
- 16 For such other and further relief as is just and equitable.

17
18 **DATED** this 15th day of February, 2021.

19
20 
21 HAROLD KARLSVIK, WSBA # 23026
22 Attorney for Plaintiff
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VERIFICATION

I, **Quentin M. Parker** plaintiff above named, being duly sworn, say as follows:

I have read the foregoing complaint and know the contents thereof, and the same is true
of my own knowledge.

DATED this 15 day of February 2021.



Quentin M. Parker

VERIFICATION

I, **Katherine R. Parker** plaintiff above named, being duly sworn, say as follows:

I have read the foregoing complaint and know the contents thereof, and the same is true
of my own knowledge.

DATED this 15 day of February 2021.


Katherine R. Parker

**SUPERIOR COURT OF WASHINGTON
IN AND FOR THURSTON COUNTY**

QUENTIN M PARKER ET AL
VS
STATE OF WASHINGTON ET AL

No. 21-2-00214-34

**NOTICE OF ASSIGNMENT AND NOTICE OF
TRIAL SETTING DATE**

TO: THURSTON COUNTY CLERK
ATTORNEYS/LITIGANTS

PLEASE TAKE NOTICE:

1. That the above-noted case number is assigned to: **The Honorable Erik D Price**
2. That the trial setting date for this case is: **June 18, 2021**

Do not come to court on the trial scheduling date. Do not call or e-mail the court. Instead, file a scheduling questionnaire and serve it on the other parties. The questionnaire is attached to this notice. Review Local Court Rule 40 for more information about scheduling.

3. **Plaintiff:** You must serve both this notice and a blank scheduling questionnaire 14 days prior to the trial setting date. If there is no proof of service, the court will not issue a case scheduling order. You must file a completed scheduling questionnaire 5 court days prior to the trial setting date.
4. **All Other Parties:** You must file and serve a completed scheduling questionnaire 2 court days prior to the trial setting date. Joint submissions by both parties are also accepted on this date.
5. Failure to timely submit a scheduling questionnaire shall not be grounds to delay issuing a case schedule order, and it shall not be grounds to continue the trial unless good cause is demonstrated.
6. The court will not issue a case schedule order unless the case is ready to be scheduled. "Readiness" for scheduling is explained in Local Court Rule 40, which is available on the court's web site and in law libraries.
7. Parties can obtain an earlier trial scheduling date by filing and serving a notice of issue form.

Dated on this the 16th day of February, 2021.

Hearing date: _____

Hearing time: _____

Judge/Calendar: _____

SUPERIOR COURT OF WASHINGTON IN AND FOR THURSTON COUNTY
--

QUENTIN M PARKER ET AL
VS
STATE OF WASHINGTON ET AL

No. 21-2-00214-34**SCHEDULING QUESTIONNAIRE SUBMITTED BY:**

- ☐ Plaintiff/Petitioner/Appellant
(file 5 court days before trial setting)
- ☐ Defendant/Respondent
(file 2 court days before trial setting)
- ☐ Joint Submission or ☐ Other Party: _____
(file 2 court days before trial setting)

See Local Court Rule 40 to learn how the court schedules cases.

1. Will this be a
- ☐
- bench trial,
- ☐
- jury trial, or
- ☐
- appeal from lower court or agency?

Note: Jury demands must be filed separately and are due by the trial setting date under CR 38(b).

2. What type of case is this (for example, contract, tort)? _____

3. What is the trial setting date for this case? _____

4. How long do you estimate the trial or final hearing will take? _____ hours
- or**
- _____ days.

5. If this is an appeal, has the appellate record (including any transcript) been delivered to the court clerk, or is there a separate certification that the record at this court is complete?
- ☐
- Yes
- ☐
- No

6. Have all of the defendants or respondents been served?
- ☐
- Yes
- ☐
- No

7. When do you anticipate this case will be ready for trial? _____

8. When are you
- unavailable**
- for trial in the next 20 - 36 months? (attach unavailable dates).

9. Is this case subject to civil arbitration?
- ☐
- Yes
- ☐
- No
- ☐
- Don't know

10. Should this case be scheduled as a priority or does this case require special management by the judge?
- ☐
- No
- ☐
- Yes (explain): _____

Date: _____

SIGNED/Bar No.: _____

Name: _____

Address: _____

City/State/Zip: _____

Telephone No: _____

E-mail address: _____

SIGNED/Bar No: _____

Name: _____

Address: _____

City/State/Zip: _____

Telephone No. _____

E-mail address: _____

E-FILED
THURSTON COUNTY, WA
SUPERIOR COURT

03/18/2021 1:59:14 PM

Linda Myhre Enlow
Thurston County Clerk

☐ EXPEDITE

☐ Hearing is set:

Date: _____

Time: _____

Judge/Calendar: _____

**IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF THURSTON**

QUENTIN M. PARKER and KATHERINE R.
PARKER, husband and wife and the marital
community thereof,

Plaintiffs,

vs.

THE STATE OF WASHINGTON;
WASHINGTON STATE PATROL; CARLOS
RODRIGUEZ, in his individual and official
capacities; KRISTI POHL, in her individual and
official capacities; DARRELL NOYES, in his
individual and official capacities; TRAVIS
CALTON, in his individual and official capacities;
MAURICE RINCON, in his individual and official
capacities; WILLIAM STEEN, in his individual and
official capacities; JAMES TAYLOR, in his
individual and official capacities; CITY OF
OLYMPIA, a municipality, AARON FICEK, in his
individual and official capacities; OPERATION
UNDERGROUND RAILROUND, INC., a foreign
non-profit corporation, THURSTON COUNTY, a
municipality and subdivision of the State of
Washington, and SHAWN HORLACHER, a former
Thurston County Deputy Prosecutor, in his
individual and official capacities; JOHN DOE AND
JANE JOE 1-10, et al.

Defendants.

NO. 21-2-00214-34

NOTICE OF APPEARANCE

TO: QUENTIN M. PARKER and KATHERINE R. PARKER, Plaintiffs

TO: HAROLD KARLSVIK, Plaintiffs Attorney

AND TO: THE CLERK OF THE ABOVE-ENTITLED COURT

**NOTICE OF APPEARANCE – 1
Cause No.: 21-2-00214-34**

*LAW, LYMAN, DANIEL,
KAMERRER & BOGDANOVICH, P.S.*
ATTORNEYS AT LAW
2674 R.W. JOHNSON RD. TUMWATER, WA 98512
P.O. BOX 11880 OLYMPIA, WASHINGTON 98508-1880
(360) 754-3480 FAX: (360) 357-3511

1 NOTICE IS HEREBY GIVEN that John E. Justice of Law, Lyman, Daniel, Kamerrer &
2 Bogdanovich, P.S. hereby makes his appearance for and on behalf of defendant City of Olympia and
3 Aaron Ficek and requests that all further notices and pleadings, except original process, be served upon
4 said defendants and its attorney at the address stated below.

5 Dated this 18th day of March, 2021.

6
7 LAW, LYMAN, DANIEL, KAMERRER
& BOGDANOVICH, P.S.

8 */s/ John E. Justice*

9 _____
10 John E. Justice, WSBA No. 23042
11 Attorney for Defendant City of Olympia
12 and Aaron Ficek
13 P.O. Box 11880, Olympia, WA 98508
14 Phone: (360) 754-3480 Fax: 360-754-3480
15 Email: jjustice@lldkb.com

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CERTIFICATE OF FILING AND SERVICE

1 I hereby certify under penalty of perjury under the laws of the State of Washington that on this
2 date, I caused to be electronically filed the foregoing document, and this Certificate of Filing & Service, and
3 have mailed a copy of this filing to the following party via First Class U.S. Mail:

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Plaintiffs Attorney:

Harold Karlsvik
Harold Karlsvik P.S.
P.O. Box 292
South Bend, WA 98586

DATED this 18th day of March, 2021 at Tumwater, WA.

/s/ Tam Truong

Tam Truong
Assistant to John E. Justice

E-FILED
THURSTON COUNTY, WA
SUPERIOR COURT
03/26/2021 8:01:40 AM
Linda Myhre Enlow
Thurston County Clerk

☐ EXPEDITE

☐ Hearing is set:

Date: _____

Time: _____

Judge/Calendar: _____

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THURSTON COUNTY

QUENTIN M. PARKER and KATHERINE R.
PARKER, husband and wife and the marital
community thereof,

Plaintiffs,

vs.

Case No: 21-2-00214-34

DECLARATION OF SERVICE

THE STATE OF WASHINGTON;
WASHINGTON STATE PATROL; CARLOS
RODRIGUEZ, in his individual and official
capacities; KRISTI POHL, in her individual and
official capacities; DARRELL NOYES, in his
individual and official capacities; TRAVIS
CALTON, in his individual and official
capacities; MAURICE RINCON, in his individual
and official capacities; WILLIAM STEEN, in his
individual and official capacities; JAMES
TAYLOR, in his individual and official
capacities; CITY OF OLYMPIA, a municipality,
AARON FICEK, in his individual and official
capacities; OPERATION UNDERGROUND
RAILROUND, INC., a foreign non-profit
corporation, THURSTON COUNTY, a
municipality and subdivision of the State of
Washington, and SHAWN HORLACHER, former
Thurston County Deputy Prosecutor, in his
individual and official capacities; JOHN DOE
AND JANE DOE 1-10, et.al.

Defendants.

DECLARATION OF SERVICE -1

Harold Karlsvik, P.S.
Attorney at Law
P.O. Box 292
Olympia, WA 98586
1 (360) 942-4612

DECLARATION OF SERVICE

I, Franklin D.R. Wilson, hereby declare as follows:

I am over the age of eighteen years and not a party to this action. That I have been a paralegal and licensed private investigator in the state of Washington since August of 2000, (20.7 years). That I have assisted defense and plaintiff counsel with over 1000 criminal, family law, and personal injury cases. That as a licensed private investigator in the State of Washington pursuant to RCW 18.180.010, I am authorized to serve legal process.

On the 25th day of March 2021 at approximately 1:57 pm, I traveled to the CT Corporation System located at 711 Capitol Way, Olympia, Washington 98501, C.T. Corporation is listed as the registered agent for Defendant (OUR) Underground Railroad, UBI #603-587-353.

I and personally served (2) sets of true and correct copies of: (1.) Summons, Complaint for Damages, Thurston County Superior Court Civil cover sheet, Notice of Assignment and Notice of Trial Setting Date, and Scheduling Questionnaire upon Defendant (OUR) by personally delivering the above reference documents to CT Corporation by being let into the locked building by "James" an employee of CT Corporation and instructed to sign-in on a clip board and deposit the legal documents into a drop-box. I followed these instructions and completed my service of process up CT Corporation the registered agent for Defendant (OUR).

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct to the best of my knowledge and belief.

3/25/2021 Olympia, WA
Date and Place of Signing


FRANKLIN D.R. WILSON

DECLARATION OF SERVICE -2

Harold Karlsvik, P.S.
Attorney at Law
P.O. Box 292
Olympia, WA 98586
1 (360) 942-4612

E-FILED
THURSTON COUNTY, WA
SUPERIOR COURT
03/26/2021 8:01:41 AM
Linda Myhre Enlow
Thurston County Clerk

☐ EXPEDITE
☐ Hearing is set:
Date: _____
Time: _____
Judge/Calendar: _____

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THURSTON COUNTY

QUENTIN M. PARKER and KATHERINE R.
PARKER, husband and wife and the marital
community thereof,

Plaintiffs,

vs.

Case No: 21-2-00214-34

DECLARATION OF SERVICE

THE STATE OF WASHINGTON;
WASHINGTON STATE PATROL; CARLOS
RODRIGUEZ, in his individual and official
capacities; KRISTI POHL, in her individual and
official capacities; DARRELL NOYES, in his
individual and official capacities; TRAVIS
CALTON, in his individual and official
capacities; MAURICE RINCON, in his individual
and official capacities; WILLIAM STEEN, in his
individual and official capacities; JAMES
TAYLOR, in his individual and official
capacities; CITY OF OLYMPIA, a municipality,
AARON FICEK, in his individual and official
capacities; OPERATION UNDERGROUND
RAILROUND, INC., a foreign non-profit
corporation, THURSTON COUNTY, a
municipality and subdivision of the State of
Washington, and SHAWN HORLACHER, former
Thurston County Deputy Prosecutor, in his
individual and official capacities; JOHN DOE
AND JANE DOE 1-10, et.al.

Defendants.

DECLARTION OF SERVICE -1

Harold Karlsvik, P.S.
Attorney at Law
P.O. Box 292
Olympia, WA 98586
1 (360) 942-4612

DECLARATION OF SERVICE

I, Franklin D.R. Wilson, hereby declare as follows:

I am over the age of eighteen years and not a party to this action. That I have been a paralegal and licensed private investigator in the state of Washington since August of 2000, (20.7 years). That I have assisted defense and plaintiff counsel with over 1000 criminal, family law, and personal injury cases. That as a licensed private investigator in the State of Washington pursuant to RCW 18.180.010, I am authorized to serve legal process.

On the 24th day of March 2021 at approximately 6:30 pm, consistent with the July 24, 2020 extension of the Governor's "Safe Start Phased Reopening" plan, through electronic email service to serviceATG@atg.wa.gov, Per the above, legal documents filed after 5 pm on May 24, 2021 are deemed to be served on the next business day, (03/25/2021). I personally served a set of true and correct copies of: (1.) Summons, Complaint for Damages, Thurston County Superior Court Civil cover sheet, Notice of Assignment and Notice of Trial Setting Date, and Scheduling Questionnaire upon Defendants Washington State Patrol and the following individuals in their official capacities only: Carlos Rodriguez, Kristi Pohl, Darrell Noyes, Travis Calton, Maurice Rincon, Williams Steen, and James Taylor. On March 25, 2021 at approximately 8:54 am the above indicated legal documents were confirmed receipted via electronic email response from Ms. Elizabeth J. Erwin, AAG, WSBA #16548. (See attachment A).

I do not believe any of the named Defendants to be in the active-duty military.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct to the best of my knowledge and belief.

3/25/2021 Olympia
Date and Place of Signing


FRANKLIN D.R. WILSON

DECLARATION OF SERVICE -2

Harold Karlsvik, P.S.
Attorney at Law
P.O. Box 292
Olympia, WA 98586
1 (360) 942-4612



Franklin Wilson <tripleinvestiga@gmail.com>

RE: Quentin M. Parker vs. State of Washington, et.al.

1 message

ATG MI Service Documents <ServiceATG@atg.wa.gov>

Thu, Mar 25, 2021 at 8:54 AM

To: Franklin Wilson <tripleinvestiga@gmail.com>, ATG MI Service Documents <ServiceATG@atg.wa.gov>

Cc: Harold Karlsvik <hkarlsvik@gmail.com>

Consistent with the July 24, 2020 extension of the Governor's "Safe Start Phased Reopening" plan, the Washington Attorney General's Office will authorize and acknowledge original service of process of a Summons and Complaint by e-mail only at the following address: serviceATG@atg.wa.gov. This authorization applies only to suits against the State of Washington, its state agencies, and state officials in their official capacities. The AGO does not otherwise agree to waive original service of process for individually named defendants and the AGO does not hereby waive service on its client agencies when service is required by statute. This waiver is effective until further notice.

Receipt on 3/25/2021 of a blank Scheduling Questionnaire, Notice of Assignment, Case Information Cover Sheet, Summons, and Complaint in *Quentin & Katherine Parker v. State, et al., Thurston County Superior Court No. 21-2-00214-34*, has been acknowledged on behalf of the Washington State Patrol and the following individuals in their official capacities only: Carlos Rodriguez, Kristi Pohl, Darrell Noyes, Travis Calton, Maurice Rincon, Williams Steen, and James Taylor, by: s/Elizabeth J. Erwin, AAG, WSBA No. 16548

From: Franklin Wilson <tripleinvestiga@gmail.com>**Sent:** Wednesday, March 24, 2021 6:30 PM**To:** ATG MI Service Documents <ServiceATG@atg.wa.gov>**Cc:** Harold Karlsvik <hkarlsvik@gmail.com>**Subject:** Quentin M. Parker vs. State of Washington, et.al.

[EXTERNAL]

Consistent with the July 24, 2020 extension of the Governor's "Safe Phased Reopening" plan, please find attached for service of process upon the State of Washington, Washington State Patrol, and Defendants Carlos Rodriguez, Kristi Pohl, Darrell Noyes, Travis Calton, Maurice Rincon, William Steen, James Taylor, In each of their official capacities the following:

1. Scheduling Questionnaire
2. Notice Assignment and Notice of Trial Setting Date
3. Case Cover Sheet
4. Complaint
5. Summon

Thank you!

--

Franklin Wilson

Paralegal and Licensed Legal Investigator
1800 Cooper Point Road, SW, Bldg #3
Olympia, Washington 98502
email:tripleinvestiga@gmail.com
Phone: (360) 350-9018
Fax: (360) 326-2273

Attachment A

3/25/2021

Gmail RE: Quentin M. Parker vs. State of Washington, et al.

Nothing contained herein should be construed as legal advice.

CONFIDENTIALITY NOTICE: This communication is intended for the sole use of the individual and entity to which it is addressed and may contain information that is privileged, confidential and exempt from disclosure under applicable law. You are hereby notified that any dissemination, distribution or duplication of this communication by someone other than the intended addressee or its designated agent is strictly prohibited. If you have received this communication in error, please notify Franklin Wilson immediately at (360) 350-9018 or reply to this communication.

E-FILED
THURSTON COUNTY, WA
SUPERIOR COURT
03/26/2021 8:01:45 AM
Linda Myhre Enlow
Thurston County Clerk

☐ EXPEDITE
☐ Hearing is set:

Date: _____

Time: _____

Judge/Calendar: _____

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THURSTON COUNTY

QUENTIN M. PARKER and KATHERINE R.
PARKER, husband and wife and the marital
community thereof,

Plaintiffs,

vs.

Case No: 21-2-00214-34

DECLARATION OF SERVICE

THE STATE OF WASHINGTON;
WASHINGTON STATE PATROL; CARLOS
RODRIGUEZ, in his individual and official
capacities; KRISTI POHL, in her individual and
official capacities; DARRELL NOYES, in his
individual and official capacities; TRAVIS
CALTON, in his individual and official
capacities; MAURICE RINCON, in his individual
and official capacities; WILLIAM STEEN, in his
individual and official capacities; JAMES
TAYLOR, in his individual and official
capacities; CITY OF OLYMPIA, a municipality,
AARON FICEK, in his individual and official
capacities; OPERATION UNDERGROUND
RAILROUND, INC., a foreign non-profit
corporation, THURSTON COUNTY, a
municipality and subdivision of the State of
Washington, and SHAWN HORLACHER, former
Thurston County Deputy Prosecutor, in his
individual and official capacities; JOHN DOE
AND JANE DOE 1-10, et.al.

Defendants.

DECLARTION OF SERVICE -1

Harold Karlsvik, P.S.
Attorney at Law
P.O. Box 292
Olympia, WA 98586
1 (360) 942-4612

DECLARATION OF SERVICE

I, Franklin D.R. Wilson, hereby declare as follows:

I am over the age of eighteen years and not a party to this action. That I have been a paralegal and licensed private investigator in the state of Washington since August of 2000, (20.7 years). That I have assisted defense and plaintiff counsel with over 1000 criminal, family law, and personal injury cases. That as a licensed private investigator in the State of Washington pursuant to RCW 18.180.010, I am authorized to serve legal process.

On the 25th day of March 2021 at approximately 2:39 pm, I traveled to the Thurston County Auditor's Office located at 2000 Lakeridge Dr SW Bld. #1, Olympia, Washington 98502, and personally served (2) sets of true and correct copies of: (1.) Summons, Complaint for Damages, Thurston County Superior Court Civil cover sheet, Notice of Assignment and Notice of Trial Setting Date, and Scheduling Questionnaire upon Defendant City of Thurston County/Thurston County Prosecuting Attorney's Office, and former Deputy Prosecutor Shawn Horlacher in his official and individual capacity by personally delivering the above reference documents to Mandy Everett an employee in the Recording Division of the Thurston County Auditor's Office who identified herself as authorized to accept Service of Process for Thurston County/Thurston County Prosecutor's Office and former Deputy Prosecutor Shawn Horlacher.

I do not believe Defendant Shawn Horlacher to be in the active-duty military.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct to the best of my knowledge and belief.

3/25/2021 *Olympia WA*
Date and Place of Signing


FRANKLIN D.R. WILSON

2

☐ EXPEDITE
☐ Hearing is set:
 Date: _____
 Time: _____
 Judge/Calendar: _____

21-2-00214-34
 AFSR 9
 Affidavit Declaration Certificate Confirmation of
 10016314



FILED
 SUPERIOR COURT
 THURSTON COUNTY, WA

2021 MAR 29 AM 10:59

Linda Myhre Enlow
 Thurston County Clerk

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
 IN AND FOR THURSTON COUNTY

QUENTIN M. PARKER and KATHERINE R.
 PARKER, husband and wife and the marital
 community thereof,

Plaintiffs,

vs.

Case No: 21-2-00214-34

DECLARATION OF SERVICE

THE STATE OF WASHINGTON;
 WASHINGTON STATE PATROL; CARLOS
 RODRIGUEZ, in his individual and official
 capacities; KRISTI POHL, in her individual and
 official capacities; DARRELL NOYES, in his
 individual and official capacities; TRAVIS
 CALTON, in his individual and official
 capacities; MAURICE RINCON, in his individual
 and official capacities; WILLIAM STEEN, in his
 individual and official capacities; JAMES
 TAYLOR, in his individual and official
 capacities; CITY OF OLYMPIA, a municipality,
 AARON FICEK, in his individual and official
 capacities; OPERATION UNDERGROUND
 RAILROUND, INC., a foreign non-profit
 corporation, THURSTON COUNTY, a
 municipality and subdivision of the State of
 Washington, and SHAWN HORLACHER, former
 Thurston County Deputy Prosecutor, in his
 individual and official capacities; JOHN DOE
 AND JANE DOE 1-10, et.al.

Defendants.

DECLARATION OF SERVICE -1

Harold Karlsvik, P.S.
 Attorney at Law
 P.O. Box 292
 Olympia, WA 98586
 1 (360) 942-4612

DECLARATION OF SERVICE

I, Franklin D.R. Wilson, hereby declare as follows:

I am over the age of eighteen years and not a party to this action. That I have been a paralegal and licensed private investigator in the state of Washington since August of 2000, (20.7 years). That I have assisted defense and plaintiff counsel with over 1000 criminal, family law, and personal injury cases. That as a licensed private investigator in the State of Washington pursuant to RCW 18.180.010, I am authorized to serve legal process.

On the 17th day of March 2021 at approximately 2:50 pm, I traveled to the City of Olympia Headquarters located at 601 4th Ave E, Olympia, Washington 98501, and personally served (2) sets of true and correct copies of: (1.) Summons, Complaint for Damages, Thurston County Superior Court Civil cover sheet, Notice of Assignment and Notice of Trial Setting Date, and Scheduling Questionnaire upon Defendant City of Olympia and Officer Aaron Ficek in his official and individual capacity by personally delivering the above reference documents to an employee of the City of Olympia, who identified her name to be Connie, and that she was authorized to accept Service of Process for the City of Olympia and Officer Aaron Ficek. In addition, I personally clarified with Connie if she was able to accept for Defendant Officer Aaron Ficek in lieu of me having to travel and serve him at his home.

I do not believe Defendant Officer Aaron Ficek to be in the active-duty military.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct to the best of my knowledge and belief.

3/17/2021 / Olympia, WA
Thurston Co.
Date and Place of Signing

FRANKLIN D.R. WILSON

DECLARATION OF SERVICE -2

Harold Karlsvik, P.S.
Attorney at Law
P.O. Box 292
Olympia, WA 98586
1 (360) 942-4612

E-FILED
THURSTON COUNTY, WA
SUPERIOR COURT
03/30/2021 2:25:43 PM
Linda Myhre Enlow
Thurston County Clerk

☐ **EXPEDITE**
☐ Hearing is Set
Date: _____
Time: _____
Judge/Calendar: Erik D. Price/Civil

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF THURSTON

QUENTIN M. PARKER and KATHERINE R.
PARKER, husband and wife and the marital
Community thereof,

No.: 21-2-00214-34

NOTICE OF APPEARANCE

Plaintiffs,

vs.

THE STATE OF WASHINGTON;
WASHINGTON STATE PATROL; CARLOS
RODRIGUES, in his individual and official
capacities; KRISTI POHL, in her individual and
official capacities; DARRELL NOYES, in his
individual and official capacities; TRAVIS
CARLTON, in his individual and official capacities;
MAURICE RINCON, in his individual and official
capacities; WILLIAM STEEN, in his individual and
official capacities; JAMES TAYLOR, in his
individual and official capacities; CITY OF
OLYMPIA, a municipality, AARON FICEK, in his
individual and official capacities; OPERATION
UNDERGROUND RAILROUND, INC., a foreign
non-profit corporation, THURSTON COUNTY, a
municipality and subdivision of the State of
Washington, and SHAWN HORLACHER, a former
Thurston County Deputy Prosecutor, in his
individual and official capacities; JOHN DOE AND
JANE DOE 1-10, et al.

Defendants.

TO: Clerk of the above-entitled Court

TO: Harold Karlsvik, Attorney for Plaintiffs

NOTICE OF APPEARANCE - 1
Case No. 12-CV-05652-RBL

O:\civi\LINDA\PLD\Damages\Parker_21-2-00214-34\NOA TC & Horlacher.docx

JON TUNHEIM
Thurston County Prosecuting Attorney
Civil Division - Bldg. No. 5
2000 Lakeridge Drive SW
Olympia, WA 98502
360/786-5574 FAX 360/709-3006

1 **AND TO:** John E. Justice, Attorney for City of Olympia and Aaron Ficek

2
3 YOU, AND EACH OF YOU, are hereby respectfully notified that Defendants, THURSTON
4 COUNTY and SHAWN HORLACHER, without waiving objections as to improper service,
5 jurisdiction, or venue, hereby enters their appearance in the above-captioned cause by and through
6 their attorneys, JON TUNHEIM, Thurston County Prosecuting Attorney, and DONALD R. (RICK)
7 PETERS, JR., Senior Deputy Prosecuting Attorney, and hereby directs that all notices and pleadings
8 other than original process in the above-captioned cause be served upon said attorneys at the address
9 below.

10 DATED this 30th day of March 2021.

11 JON TUNHEIM
12 PROSECUTING ATTORNEY

13 

14 DONALD R. (RICK) PETERS, WSBA #23642
15 Senior Deputy Prosecuting Attorney
16 Attorney for Defendants Thurston County and
17 Shawn Horlacher
18 2000 Lakeridge Dr SW, Bldg 5
19 Olympia, WA 98502
20 rick.peters@co.thurston.wa.us

CERTIFICATE OF SERVICE

I certify that I caused a copy of the foregoing document to be electronically filed and served on the parties or their counsel of record on this 30th day of March 2021, as follows:

<u>Attorney for Plaintiffs:</u> Harold Karlsvik Harold Karlsvik P.S. P.O. Box 292 South Bend, WA 98586 hkarlsvik@comcast.net	<input checked="" type="checkbox"/> US Mail, Postage Prepaid <input type="checkbox"/> Certified Mail, Return Receipt Requested <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Email
<u>Attorney for City of Olympia and Aaron Ficek:</u> John E. Justice Law, Lyman, Daniel, Kamerrer & Bogdanovich, P.S. P.O. Box 11880 Olympia, WA 98508 Email: jjjustice@lldkb.com	<input checked="" type="checkbox"/> US Mail, Postage Prepaid <input type="checkbox"/> Certified Mail, Return Receipt Requested <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Email

I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

DATED this 30th day of March 2021.


 Nancy Jones-Hegg, Paralegal

E-FILED
THURSTON COUNTY, WA
SUPERIOR COURT
03/31/2021 4:47:06 PM
Linda Myhre Enlow
Thurston County Clerk

Superior Court of Washington

Plaintiff / Petitioner: Quentin M. Parker and Ketherine R. Parker	Case No: 21-2-00214-34
Defendant / Respondent: The State of Washington; Washington State Patrol; et al	DECLARATION OF SERVICE

The undersigned, being first duly sworn on oath deposes and says: That he/she is now and at all times herein mentioned was a citizen of the United States, over the age of eighteen years, not a party to or interested in the above entitled action and competent to be a witness therein.

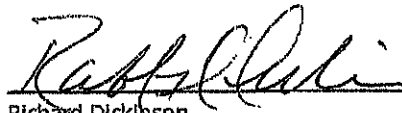
That on Mon, Mar 29 2021 at 07:34 PM, at the address of 5727 N 1700 W, within Cedar City, Utah, the undersigned duly served the following document(s): Notice-of-Assignment-and-Notice-of-Trial-setting, Scheduling-Questionnaire, Filed-Civil-Case-Info, Filed-Summons, Filed-Complaint in the above entitled action upon Operation Underground Railroad, Inc. % Tevya Ware, Registered Agent, by then and there, at the residence and usual place of abode of said person(s), personally delivering 1 true and correct copy(ies) of the above documents into the hands of and leaving same with Tevya Ware.

Description:

Other: White female approximately 44-45 years of age.;

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct:

Date: 03-30-2021


Richard Dickinson
G102536
ICU Investigations, LLC
250 N Red Cliffs Dr, #4B-275
Saint George, UT 84790
435-986-1200

ICU INVESTIGATIONS

Process Servers & Private Investigators
 250 N Red Cliffs Dr
 STE 4B-275
 St. George, UT 84790

serve@iculegal.com

435-986-1200

processserverutah.com

Invoice

DATE IN	INVOICE #
3/29/2021	47469
TERMS	DUE DATE
Credit Card	3/30/2021

JOB TYPE	Process Service
PRICE TYPE	Routine

CLIENT: 360-350-9018 tripleinvestiga@gmail.com

Triple F's Investigation
 1800 Cooper Point Rd SW
 Olympia, WA 98502

CLIENT REF	Frank
STATE/DOCS	WA S&C
SERVE ON	Operation Underground
FINAL STATUS	Served
WHO SERVED	Tevya Ware

ITEM	QTY	COURT DATE	DESCRIPTION	AGENT	RD	OUR #	PRICE	AMOUNT
Process ...			PARKER v STATE OF WASHINGTON 21-2-00214-34			5502812	126.00	126.00
Pages	27		Civil Process Service (Operation Underground Railroad, Inc. % Tevya Ware, Registered Agent / 5727 N 1700 W, Cedar City, Utah 84721)				0.25	6.75
Civil PS ...			Page fee				0.00	0.00
			Civil Process Service Mileage (032921 @ 734pm) = Served Tevya Ware					132.75
			Subtotal					
Visa			Credit Card Fee				3.20%	4.25
			Subtotal					137.00
NOTES								
032921 = Entity snip in folder. (Entity Number 8791496-0140)								
033021 = Emailed copies, mailed originals								

All work is complete! Please remit payment to the above address.**Remit by credit card online: <https://www.processserverutah.com/remittance-payment>**

Client agrees to pay the balance of this invoice, including all fees, expenses and sales tax upon receipt of this invoice by mail or email. There are no open terms. Bookkeeping charges equal to 2.5% of the balance shall be added every thirty (30) days to all unpaid invoices which become 30 or more days past due. Over 90 days is subject to an additional \$25 excess bookkeeping fee. Client will be responsible for any attorney fees or court costs associated with collection of this invoice. Pay from this invoice, no statement will be sent. Make checks payable to ICU investigations, credit card payments can be made on our website. We add 3.2% to all credit card payments. See website for our W9. ICU is not and cannot be responsible for the filing of proofs of service to any court. Mail all checks to the address noted at the top of this invoice.

Total	\$137.00
Payments	-\$137.00
Balance	\$0.00

ICU Tax ID # 90-0546546

E-FILED
THURSTON COUNTY, WA
SUPERIOR COURT

04/02/2021 4:24:35 PM

Linda Myhre Enlow
Thurston County Clerk

**STATE OF WASHINGTON
THURSTON COUNTY SUPERIOR COURT**

QUENTIN M. PARKER and
KATHERINE R. PARKER, husband
and wife and the marital community
thereof,

Plaintiffs,

v.

THE STATE OF WASHINGTON;
WASHINGTON STATE PATROL;
CARLOS RODRIGUEZ, in his individual
and official capacities; KRISTI POHL, in
her individual and official capacities;
DARRELL NOYES, in his individual and
official capacities; TRAVIS CALTON, in
his individual and official capacities;
MAURICE RINCON, in his individual and
official capacities; WILLIAM STEEN, in
his individual and official capacities;
JAMES TAYLOR, in his individual and
official capacities; CITY OF OLYMPIA, a
municipality, AARON FICEK, in his
individual and official capacities;
OPERATION UNDERGROUND
RAILOUND, INC., a foreign non-profit
corporation, THURSTON COUNTY, a
municipality and subdivision of the State of
Washington, and SHAWN HORLACHER,
former Thurston County Deputy
Prosecutor, in his individual and official
capacities; JOHN DOE AND JANE DOE
1-10, et.al.

Defendants.

NO. 21-2-00214-34

NOTICE OF APPEARANCE

1 TO: QUENTIN M. AND KATHERINE R. PARKER, Plaintiffs,
2 TO: HAROLD KARLSVIK, Plaintiffs' Attorney,
3 TO: TO ALL PARTIES AND COUNSEL OF RECORD,
4 AND TO: CLERK OF THE COURT.

5 YOU AND EACH OF YOU will please take notice that the Defendants STATE OF
6 WASHINGTON, WASHINGTON STATE PATROL, CARLOS RODRIGUEZ, KRISTI
7 POHL, DARRELL NOYES, TRAVIS CALTON, MAURICE RINCON, WILLIAM STEEN
8 and JAMES TAYLOR, by and through their attorneys, Robert W. Ferguson, Attorney General,
9 and LORI A. NICOLAVO and STEVE PUZ Assistant Attorneys General, without waiving any
10 objections they may have as to improper service, jurisdiction or venue, hereby enter their
11 appearance in the above-entitled action, and further request that all further papers, except
12 original process, be served upon the undersigned attorneys at their below-stated address.

13 DATED this 2nd day of April 2021.

14 ROBERT W. FERGUSON
15 Attorney General

16 s/ Steve Puz

17 LORI NICOLAVO, WSBA No. 30370
18 STEVE PUZ, WSBA No. 17407
19 OID #91023
20 Assistant Attorneys General
21 Attorneys for Washington State Patrol
22 7141 Cleanwater Drive SW
23 P.O. Box 40126
24 Olympia, WA 40126
25 (360)586-6300
26

PROOF OF SERVICE

I certify that I caused to be served a copy of this document on all parties or their counsel of record on the date below as follows:

<u>Party</u>	<u>Method of Service</u>
Attorneys for Plaintiff Harold Karlsvik Harold Karlsvik P.S. P.O. Box 292 South Bend, WA 98586 (360) 942-4612 hkarlsvik@comcast.net	<input checked="" type="checkbox"/> US Mail Postage Prepaid via Consolidated Mail Service <input type="checkbox"/> ABC/Legal Messenger <input type="checkbox"/> State Campus Delivery <input type="checkbox"/> Hand delivered by _____
Attorneys for City of Olympia and Aaron Ficek John E. Justice Law, Lyman, Daniel, Kammerrer & Bogdanovich, P.S 2674 R.W. Johnson Blvd. Tumwater, WA 98512 jjjustice@lldkb.com	<input checked="" type="checkbox"/> US Mail Postage Prepaid via Consolidated Mail Service <input type="checkbox"/> ABC/Legal Messenger <input type="checkbox"/> State Campus Delivery <input type="checkbox"/> Hand delivered by _____
Attorney for Thurston County Donald R. Peters, Jr. Thurston County Prosecutor's Office 2000 Lakeridge Dr. SW Bldg 2 Olympia, WA 98502-6045 petersr@co.thurston.wa.us	<input checked="" type="checkbox"/> US Mail Postage Prepaid via Consolidated Mail Service <input type="checkbox"/> ABC/Legal Messenger <input type="checkbox"/> State Campus Delivery <input type="checkbox"/> Hand delivered by _____

I certify under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

DATED this 2nd day of April 2021, at Tumwater, Washington.

s/ Steve Puz
LORI NICOLAVO, WSBA No. 30370
STEVE PUZ, WSBA No. 17407
Assistant Attorneys General

E-FILED
THURSTON COUNTY, WA
SUPERIOR COURT
04/06/2021 4:54:51 PM
Linda Myhre Enlow
Thurston County Clerk

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR COUNTY OF THURSTON

QUENTIN M. PARKER and KATHERINE R.
PARKER, husband and wife and the marital
community thereof,

Plaintiffs,

v.

THE STATE OF WASHINGTON;
WASHINGTON STATE PATROL; CARLOS
RODRIGUEZ, in his individual and official
capacities; KRISTI POHL, in her individual
and official capacities; DARRELL NOYES, in
his individual and official capacities; TRAVIS
CALTON, in his individual and official
capacities; MAURICE RINCON, in his
individual and official capacities; WILLIAM
STEEN, in his individual and official
capacities; JAMES TAYLOR, in his individual
and official capacities; CITY OF OLYMPIA, a
municipality; AARON FICEK, in his
individual and official capacities;
OPERATION UNDERGROUND
RAILROAD, INC., a foreign non-profit
corporation; THURSTON COUNTY, a
municipality and subdivision of the State of
Washington; SHAWN HORLACHER, a
former Thurston County Deputy Prosecutor, in
his individual and official capacities; JOHN
DOE AND JANE JOE 1-10, et al.,

Defendants.

Case No. 21-2-00214-34

NOTICE OF APPEARANCE

1 TO: QUENTIN M. PARKER and KATHERINE R. PARKER, Plaintiffs
2 TO: HAROLD KARLSVIK, Plaintiffs' Attorney
3 AND TO: THE CLERK OF THE ABOVE-ENTITLED COURT

4 Please take notice that Clifford S. Davidson of Snell & Wilmer L.L.P. hereby enters an
5 appearance on behalf of defendant Operation Underground Railroad, Inc., without waiving any
6 objections as to improper service, jurisdiction or venue, and requests that all further notices and
7 pleadings, except original process, be served upon said defendant and its attorney at the address
8 stated below.

9 Dated: April 6, 2021

SNELL & WILMER L.L.P.

11 By: s/ Clifford S. Davidson

12 Clifford S. Davidson, WSBA No. 48313
13 csdavidson@swlaw.com

14 Attorneys for Defendant
15 Operation Underground Railroad, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on April 6, 2021 I caused to be served a full and exact copy of the foregoing **NOTICE OF APPEARANCE** on the following persons:

Harold Karlsvik
Harold Karlsvik, P.S.
PO Box 292
South Bend, WA 98586
hkarlsvik@comcast.net
Attorney for Plaintiff

Lori Nicolavo
Steve Puz
Assistant Attorneys General
State of Washington
7141 Cleanwater Drive SW
PO Box 40126
Olympia, WA 98504-0126
Lori.Nicolavo@atg.wa.gov
Attorneys for State of Washington,
Washington State Patrol, Carlos Rodriguez,
Kristi Pohl, Darrell Noyes, Travis Calton,
Maurice Rincon, William Steen and James
Taylor

Donald R. (Rick) Peters
Thurston County Prosecutor's Office
Civil Division – Bldg. No. 5
2000 Lakeridge Drive SW
Olympia, WA 98502
rick.peters@co.thurston.wa.us
Attorney for Thurston County and Shawn
Horlacher

John E. Justice
Law, Lyman, Daniel, Kamerrer &
Bogdanovich, P.S.
PO Box 11880
Olympia, WA 98508
jjustice@lldkb.com
Attorneys for City of Olympia and Aaron
Ficek

by the following indicated method(s):

- ☒ First Class Mail, postage prepaid, deposited in the US mail at Portland, OR
- ☐ Hand delivery
- ☐ Facsimile transmission
- ☐ Overnight delivery
- ☒ Email
- ☐ Electronic filing notification

Dated: April 6, 2021

s/ Clifford S. Davidson
Clifford S. Davidson, WSBA No. 48313